## UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD REGION 29

GLOBAL CONTACT SERVICES, INC.,	)
Employer,	)
	)
and	) Case No. 29-RC-134071
	)
LOCAL 621, UNITED CONSTRUCTION	)
TRADES & INDUSTRIAL EMPLOYEES	)
Petitioner.	)
	)
and	)
	)
TRANSPORT WORKERS UNION	)
LOCAL 100, AFL-CIO	)
Intervenor	)
	)
and	)
	)
LOCAL 322, UNITED WORKERS OF	)
AMERICA	)
Intervenor	)

## EMPLOYER'S EXCEPTIONS TO THE HEARING OFFICER'S REPORT ON OBJECTIONS

Pursuant to Sections 102.69 and 102.67 of the Rules and Regulations of the National Labor Relations Board ("Board" or "NLRB"), Global Contact Services, Inc. ("the Employer" files the following Exceptions to the Hearing Officer's Report on Objections in the above captioned case.

1. The Employer files an exception to the findings and recommendations of the Hearing Officer in Objection No. 1(a) because they ignore the credible record evidence.

- 2. The Employer files an exception to the findings and recommendations of the Hearing Officer in Objection No. 1(b) because they ignore the credible record evidence.
- 3. The Employer files an exception to the Hearing Officer's credibility findings.
- 4. The Employer files an exception to the Hearing Officer's failure to draw an adverse inference regarding Local 100's failure to call witnesses reasonably assumed to be favorably disposed toward Local 100.
- 5. The Employer files an exception to the Hearing Officer's recommendations that a Certification of Representative be issued.

Respectfully Submitted,

Christopher R. Coxson, Esq.

Counsel for Global Contact Services, Inc.

Christopher R. Coxson OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C. 10 Madison Avenue, Suite 400

Morristown, NewJersey, 07960

Phone: (973) 656-1600 Fax: (973) 656-1611

Email: christopher.coxson@ogletreedeakins.com

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of Employer's Exceptions To The Hearing Officer's Report On Objections has been served via electronic mail this 23<sup>rd</sup> day of December, 2014:

Kenneth N. Page, Esq. Transport Workers Union of Greater New York Local 100, AFL-CIO 195 Montague Street, 3 <sup>rd</sup> Floor Brooklyn, NY 11201 kpage@twulocal100.org  Stephen Goldblatt, Esq. Law Offices of Stephen Goldblatt, PC 3315 Nostrandt Avenue, Suite L1-A Brooklyn, NY 11229-3269 goldblattlegal@gmail.com	James G. Paulsen Regional Director National Labor Relations Board Region 29 Two Metro Tech Center 100 Myrtle Avenue, 5th Floor Brooklyn, NY 11201-4201 James.paulsen@nlrb.gov Tracey Belfiore Hearing Officer National Labor Relations Board Region 29 Two Metro Tech Center 100 Myrtle Avenue, 5th Floor Brooklyn, NY 11201-4201 tracey.belfiore@nlrb.gov
Stephen Sombrotto Business Manager United Workers of America, Local 322 367 Long Beach Road Long Beach, New York 11558 ssombrotto@icloud.com	

Christopher Coxson